

June 8, 2004

Commandant Thomas H. Collins
U.S. Coast Guard
2100 Second Street, SW
Washington, DC 20593

RE: NEPA Review of Jetski Races

Dear Commandant Collins:

Over the next few months, several personal watercraft (PWC) races are scheduled to be held across the country. At many of these races, such as the 2004 Dos Equis World Finals at Lake Havasu City in Arizona, United States Coast Guard (USCG) compliance with the National Environmental Policy Act (NEPA) (42 U.S.C. 4321-4347) is necessary before race permits can be issued.

The NEPA directs federal agencies to consider the potential impacts of a proposed action upon the environment prior to implementation of that action. Specifically, NEPA requires federal agencies to release a detailed statement by the responsible official on:

- (i) the environmental impact of the proposed action,
- (ii) any adverse environmental effects which cannot be avoided should the proposal be implemented,
- (iii) alternatives to the proposed action,
- (iv) the relationship between local short-term uses of man's environment and the maintenance and enhancement of long-term productivity, and
- (v) any irreversible and irretrievable commitments of resources that would be involved in the proposed action should it be implemented.

Jetski racing has been shown to have a major impact on the environment. After just five hours of racing during last year's Benicia Water Front Festival, levels of benzene and methyl-tertiary butyl ether (MTBE) rose dramatically. Benzene, a known carcinogen, exceeded health standards by 270 percent. MTBE levels were more than 730 percent of state standards and 1900 percent above standards established for taste and odor. These tests reveal significant environmental impacts and health risks from such an event.

At Lake Canandaigua in New York, two days of PWC races led to an increase in toxic substances such as benzene, toluene, and MTBE by as much as 11,000%, to levels dramatically higher than accepted health standards. PWC release 25% to 40% of their fuel-oil mixture unburned into the environment, which means that jetski races release several hundred gallons of fuel into water bodies over the course of only two days. In fact, in 1999 the California Coastal Commission denied the IJSBA a permit to move the jetski world finals to San Diego's Mission Bay, due in part to reports that the race would dump nearly 10,000 gallons of unburned gas and oil into the environment. The Coastal

Commission was also told that the three day event would release as much air pollution as driving a modern car nearly 37,000,000 miles.

Given the significant impact of PWC races upon the environment, the USCG is required to conduct NEPA reviews including a federal register notice and public comment for at least 60 days prior to the Dos Equis World Finals at Lake Havasu City scheduled for October 3-10, 2004. In addition, the USCG will need to conduct similar reviews for the following races:

- July 30th – August 1st Benicia Waterfront Festival at Benicia, California
- August 7-8th Milwaukee Air & Watercross Invitational at Milwaukee, WI
- August 14-15th Somerfest at Lake Somerville, TX
- August 22nd Calamas Reservoir Jet Ski Rodeo Festival at Burwell, NE
- August 22nd Highpoint Marina Races at Lake Texoma, TX
- September 12th Play day at Genes - Baytown, TX
- September 18-19th Washington State Championships at the Howard Amon Park, Richland, WA
- September TBA - Endurance/SuperCourse National Championships at Belton Lake, TX

Bluewater Network would appreciate being notified and placed upon appropriate mailing lists regarding these reviews.

Thank you for your consideration of this important matter. We look forward to your response.

Sincerely,

Sean Smith
Public Lands Director